

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

HAROLD STATEN

Plaintiff

v.

**THE CITY OF PHILADELPHIA and
DETECTIVE JAMES J. MCNESBY**

Defendants

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Civil Action No. 24-1380

JURY TRIAL DEMANDED

PLAINTIFF’S RESPONSE TO DEFENDANTS’ MOTION TO COMPEL DISCOVERY
(ECF No. 50)

1-11. Denied as moot. Plaintiff provided the requested discovery on April 21, 2025. The provided discovery included responses to Defendant McNesby’s Interrogatories and Defendant City of Philadelphia’s Requests for Production of Documents. Additionally, Plaintiff provided 2,143 pages responsive to Defendants’ document requests and a privilege log for documents that were withheld either as work product or privileged. Resultingly, Plaintiff respectfully asks this Court to deny Defendants’ Motion to Compel as moot due to Plaintiff’s belated compliance with the Federal Rules of Civil Procedure concerning responses to written discovery requests.

Respectfully submitted,

/s/ Kevin Harden, Jr. _____
Kevin Harden, Jr.
Attorney for Plaintiff, Harold Staten

CERTIFICATE OF SERVICE

I, Kevin Harden, Jr., certify that I caused this Reply to Defendants' Motion to Compel Discovery (ECF No. 50) to be served upon Defendants by way of Electronic Case Filing provided by the Office of the Clerk of Court for the United States District Court for the Eastern District of Pennsylvania.

Date: April 23, 2025

/s/ Kevin Harden, Jr.
Kevin Harden, Jr.